

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

Master No. 3:15-cv-07658-MAS-RLS

JUDGE MICHAEL A. SHIPP
MAGISTRATE JUDGE RUKHSANAH L. SINGH

THIS DOCUMENT RELATES TO:

SECURITIES CLASS ACTION

**ORDER OF THE SPECIAL MASTER
JUDGE DENNIS CAVANAUGH, RET.
GRANTING CONSOLIDATED
MOTION TO SEAL TRIAL BRIEF AND
EXHIBITS**

Defendant in the above-captioned action, Valeant Pharmaceuticals International, Inc. (“Valeant”), having filed a Motion to Seal designated portions of Defendants’ Trial Brief (3:15-cv-07658, Dkt. No. 1496), and designated portions of Plaintiffs’ Trial Brief (3:15-cv-07658, Dkt. No. 1497) and specific exhibits related to Plaintiffs’ Trial Brief, and the Special Master having reviewed Defendant’s Motion to Seal and supporting submissions, the Court in the above-captioned action makes the following findings of fact and conclusions of law, pursuant to Local Rule 5.3(c):

1. The Special Master finds that there are Stipulations and Confidentiality Orders entered by the Court in these matters (“Confidentiality Orders”), which allow the Producing Party to use a confidentiality designation for, among other things, “any Discovery Material . . . if such party in good faith believes that such Discovery Material contains . . . commercially sensitive information that requires the protections in this Stipulation and Order.”

2. The Special Master further finds that Confidential documents and deposition testimony as marked by Defendants and Plaintiffs contain confidential and sensitive information as defined by the Confidentiality Orders and were properly designated as such.

3. The Special Master agrees that the information sought to be sealed contains information that is confidential and sensitive in nature as it reveals, among other things, commercially sensitive business information and information.

4. The Special Master further finds that revealing to the public the sensitive and confidential information sought to be sealed would cause a clearly defined, serious injury to the Parties and prevent their legitimate interests in protecting their business model, policies, and procedures.

5. The Special Master further agrees that the Parties have proposed the least restrictive means of maintaining confidentiality.

6. The Parties do not object to each other's requests to seal the Confidential or Highly Confidential documents. The Special Master is not aware of any other party or nonparty who opposes this motion.

7. Accordingly, the Special Master finds, under the considerations set forth in Local Civil Rule 5.3(c), that good cause exists to permanently seal the temporarily sealed material referenced in the prepared index attached to this Motion.

8. Further, the Special Master finds, under the considerations set forth in Local Civil Rule 5.3(c), that good cause exists to permanently redact the temporarily redacted material referenced in the prepared index attached to this Motion.

Date: September 12, 2024

Dennis M. Cavanaugh
DENNIS M. CAVANAUGH
Special Master